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7 REPUBLIC SILVER STATE DISPOSAL, INC. d/b/a
8 REPUBLIC SERVICES OF SOUTHERN NEVADA

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 MICHAEL MILLER,

13 Plaintiff,

14 v.

15 INTERNATIONAL BROTHERHOOD OF
16 TEAMSTERS, LOCAL 631; REPUBLIC
SERVICES OF SOUTHERN NEVADA,

17 Defendants.
18

Case No. 2:21-cv-01693-RFB-NJK

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO FILE
ANSWERS TO COMPLAINT
[FIRST REQUEST]**

19 Plaintiff MICHAEL MILLER (“Plaintiff”) and Defendants INTERNATIONAL
20 BROTHERHOOD OF TEAMSTERS, LOCAL 631 and REPUBLIC SILVER STATE
21 DISPOSAL, INC. d/b/a REPUBLIC SERVICES OF SOUTHERN NEVADA (“Defendants”), by
22 and through their counsel of record, hereby stipulate and agree to extend the time for Defendants
23 to file an answer to the operative complaint from the current deadline of August 26, 2022, for two
24 weeks, up to and including **September 9, 2022.**

25 This is the first request for an extension of time to file an answer. On August 12, 2022, the
26 Court held a hearing on Defendants’ Motions to Dismiss and denied the motions. ECF No. 66.
27 Pursuant to FRCP 15(a)(3), an answer is due 14 days after the denial of the motions to dismiss.
28 The requested extension is necessary because defense counsel needs additional time to prepare the

Answers and have various other commitments that will prevent completion of the same within the current deadline.

The instant request is made in good faith and not for the purpose of delay.

Dated: August 23, 2022

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Respectfully submitted,

Respectfully submitted,

/s/ Trevor J. Hatfield

TREVOR J. HATFIELD, ESQ.

Attorneys for Plaintiff
MICHAEL MILLER



ETHAN D. THOMAS, ESQ.
DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
REPUBLIC SILVER STATE DISPOSAL, INC.
d/b/a REPUBLIC SERVICES OF SOUTHERN
NEVADA

Dated: August 23, 2022

Respectfully submitted,

/s/ Sarah Grossman-Swenson

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SARAH GROSSMAN-SWENSON, ESQ.
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HOLSBERRY

Attorneys for Defendant
INTERNATIONAL
BROTHERHOOD OF TEAMSTERS
LOCAL 631

IT IS SO ORDERED.

Dated: August 23, 2022.



UNITED STATES MAGISTRATE JUDGE

4856-8848-3119.1 / 068119-2312